



DEPARTMENT OF THE ARMY
HEADQUARTERS UNITED STATES ARMY FORCES COMMAND
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REPLY TO
ATTENTION OF

AFLG-PR

26 Aug 99

MEMORANDUM FOR FORSCOM Directorates of Contracting

SUBJECT: Contracting Information Letter (CIL) 99-39, Contract
Data Requirements

1. Several inquiries have been received regarding FORSCOM policy on the use of Contract Data Requirements List (CDRL), DD Form 1423 and Data Identification Document (DID), DD Form 1664. This guidance is applicable to Commercial Activities studies and most base operations solicitations.
2. DA Pamphlet 5-20 states the DD Form 1423 and the DD Form 1664 should be used to list all data, forms, reports and other documents that the contractor must deliver under the contract. However, Army policy is that the use of CDRLs and DIDs is not required in a solicitation and resulting contract. The specific requirements for data submission should be spelled out in the statement of work or contract line item(s).
3. To further acquisition reform and streamlining initiatives, FORSCOM has not mandated the use of CDRLs since, in most instances, they repeat the information already covered in the performance work statement. Generally speaking, any tailored, concise listing of deliverables that affords the ability to adequately assess and/or receive the required data/deliverables is acceptable for most base operations requirements.
4. We encourage you to tailor the data deliverables specifically to the requirements in the work statement. Data requirements should be established based on the intended use of the data with consideration given to the immediate, planned or probable future of the system, material or service to which the data relates. Care must be taken to ensure that appropriate data requirements are established. Too much data can be costly and useless, while insufficient data can have a negative impact on future operations, maintenance and logistical support of equipment. Tailoring data requirements and minimizing the

AFLG-PR

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amount of data requested should be a prime consideration especially for commercial items/services and in a performance-based acquisition environment.

5. In a performance-based acquisition, the government specifies only the final outcome of the contractual effort and leaves the contractor free to propose how best to achieve the outcome. This approach may also be applied to the specification of contract data requirements. Performance-based specification of data requirements defines the government's need for data and leaves the contractor free (for the most part) to propose the content and format of data provided to satisfy that need. Ideally, the government would accept the standard industry practices regarding the format and content of the data.

6. Adopting a performance-based approach to specifying data requirements would result in the following advantages:

a. Total contract data requirements would be reduced/minimized thereby reducing the costs of data. Contractors could propose to provide the government with relevant portions of the data they generate to perform the contract and any additional data the customer would need to operate and maintain the product or adequately assess the performance of the service.

b. Contractors would have greater freedom to propose data requirements in their terms and format rather than have to change their format to fit the governments. Contractors could identify standard commercial data requirements appropriate to the item/service being procured and these could be incorporated in the resulting contract.

c. An expanded industrial base resulting in increased competition. By specifying performance-based contract data requirements in solicitations, any commercial firm could successfully bid on most government contracts without having any particular knowledge of DOD peculiar data requirements.

AFLG-PR

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7. In summary, we encourage utilizing cheaper and smarter ways to do business especially in data management. Minimizing requested data; eliminating non-value data requirements; and tailoring to meet the specific needs are all efforts that we can make to reform our data management process.

8. Point of contact is Judy S. Armstrong, DSN 367-5642,
armstroj@forscom.army.mil

A handwritten signature in cursive script, reading "Beverly Y. Thomas". The signature is written in black ink and is positioned above the typed name and title.

BEVERLY Y. THOMAS
Acting Chief, Contracting Division, DCSLOG
Acting Principal Assistant Responsible
for Contracting